

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

R'KES STARLING, individually and behalf of  
all others similarly situated,

Plaintiff,

v.

PR ADVISORS, LLC, D/B/A PINNACLE  
REALTY ADVISORS and RAM  
PROPERTIES, LLC,

Defendants.

Case No. 1:24-cv-00991-RP

**NOTICE OF PROPOSED JOINT SCHEDULING ORDER**

Pursuant to the Court's Order of March 7, 2025 (*see* Dkt. 33, "Order"), the Parties to the above-captioned matter respectfully and jointly submit the attached proposed scheduling order for the Court's consideration. This submission is made jointly to comply with the Order, but is without prejudice to the Defendants' pending "Motion for Protective Order to Temporarily Stay or Bifurcate Discovery" (*see* Dkt. 29), or the Parties' respective positions relating thereto.

Dated: March 21, 2025

Respectfully submitted,

*/s/ Andrew Roman Perrong*  
Andrew Roman Perrong, Esq.  
Perrong Law LLC  
2657 Mount Carmel Avenue  
Glenside, Pennsylvania 19038  
Phone: 215-225-5529 (CALL-LAW)  
Facsimile: 888-329-0305  
a@perronglaw.com

*Attorney for Plaintiff and the Proposed Class*

By: /s/ A. Paul Heeringa (with permission)

**JOHN W. MCGUINNESS**  
jmguinness@manatt.com  
(Admitted *Pro Hac Vice*)  
**A. PAUL HEERINGA**  
pheeringa@manatt.com  
(Admitted *Pro Hac Vice*)  
MANATT, PHELPS & PHILLIPS, LLP  
1050 Connecticut Avenue, NW, Suite 600  
Washington, D.C. 20036  
Telephone: 202-585-6500  
Facsimile: 202-585-6600

**C. BRENTON KUGLER**  
Texas State Bar No. 11756250  
brent.kugler@solidcounsel.com  
SCHEEF & STONE, L.L.P.  
500 North Akard, Suite 2700  
Dallas, Texas 75201  
(214) 706-4200 - Telephone  
(214) 706-4242 – Facsimile

And

**LEONCIO A. GIL, III**  
Texas State Bar No. 24094204  
leon.gil@solidcounsel.com  
SCHEEF & STONE, L.L.P.  
2600 Network Blvd., Suite 400  
Frisco, Texas 75034  
(214) 472-2100 – Telephone  
(214) 472-2150 – Facsimile

*Counsel for Defendant PR Advisors, LLC*

By: /s/ Yusuf A. Bajwa (with permission)  
Yusuf A. Bajwa  
Texas Bar No. 24047754  
Lad Z. Stricker  
Texas Bar No. 24110876  
SANDERS BAJWA LLP  
919 Congress Avenue, Suite 1305  
Austin, Texas 78701

[Tel.] (512) 535-2440  
ybajwa@sandersbajwa.com  
lstricker@sandersbajwa.com  
*Attorneys for Defendant RAM Properties, LLC*

**CERTIFICATE OF SERVICE**

I certify that on, March 20, 2025, a true and correct copy of the foregoing document was electronically filed with the Court's ECF system to be sent via the electronic notification system to all counsel of record in the above-captioned matter.

/s/ Andrew Roman Perrong  
Andrew Roman Perrong, Esq.  
Perrong Law LLC  
2657 Mount Carmel Avenue  
Glenside, Pennsylvania 19038  
Phone: 215-225-5529 (CALL-LAW)  
Facsimile: 888-329-0305  
a@perronglaw.com

*Attorney for Plaintiff and the Proposed Class*